

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KRISTEN FREDRICKS, JOSEPH V. CUFFARI,
JOSEPH E. GANGLOFF, and JAMES M. READ

Plaintiffs,

v.

COUNSEL OF THE INSPECTORS GENERAL
ON INTEGRITY AND EFFICIENCY (“CIGIE”)
INTEGRITY COMMITTEE (“IC”); KEVIN H.
WINTERS, Chairman, IC, in his official capacity;
ROBERT P. STORCH, Vice-Chairman, IC, in his
official capacity; GAIL S. ENNIS, Member, IC, in
her official capacity; KIMBERLY A. HOWELL,
Member, IC, in her official capacity; DALE A.
CHRISTOPHER, Deputy Director for Compliance,
U.S. Office of Government Ethics, in his official
capacity; TOM MONHIM, Member, IC, in his
official capacity; CATHERINE S. BRUNO, Member,
IC, in her official capacity; ALLISON LERNER,
Inspector General, National Science Foundation,
Former Chair and Vice Chair, CIGIE, in her official
capacity,

Defendants.

No. 1:23-cv-442 (RDA/LRV)

**DEFENDANTS’ CONSENT MOTION FOR AN EXTENSION OF TIME TO FILE
THEIR REPLY IN SUPPORT OF THEIR MOTION TO DISMISS**

Defendants, in their official capacities and through the undersigned counsel, respectfully submit this consent motion for a limited, three-day extension of time to file their reply in support of their motion to dismiss. In support thereof, Defendants set forth the following background and good cause for the requested scheduling relief.

1. Plaintiffs brought this action arising out of their interactions with the Counsel of the Inspectors General on Integrity and Efficiency, Integrity Committee (“CIGIE IC”), and bring

six claims challenging the CIGIE IC's function and its handling of complaints made against the Plaintiffs. *See* Compl. (Dkt. No. 1).

2. On June 23, 2023, Defendants filed a motion to dismiss Plaintiffs' complaint for lack of subject matter jurisdiction and failure to state a claim. *See* Dkt. Nos. 8-9.

3. On June 27, 2023, the parties jointly moved to extend the dates for Plaintiffs' opposition and Defendants' reply, such that Plaintiffs' opposition would be due on July 14, 2023, and Defendants' reply would be due on July 25, 2023.

4. The undersigned counsel respectfully request a limited extension of three additional days—until July 28, 2023—in which to file their reply in support of their motion to dismiss. One of the undersigned counsel and her family has the COVID-19 virus, and the other undersigned counsel is also caring for a sick child this week.

5. Accordingly, Defendants respectfully request an extension of time, until July 28, 2023, to file their reply in support of their motion to dismiss Plaintiffs' complaint.

6. Plaintiffs' counsel has informed the undersigned counsel that Plaintiffs consent to the relief requested in this motion.

7. A proposed order is attached for the Court's convenience.

Dated: July 20, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

JESSICA D. ABER
UNITED STATES ATTORNEY

/s/
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